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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

FILED

2011 AP 13 PM 1:48

WESTERN DISTRICT OF TEXAS
U.S. CLERK'S OFFICE

BY: _____ DEPUTY

UNITED STATES OF AMERICA

§ INDICTMENT

v.

§
§
§
§

[Violation: Preparing False Income Tax

JUAN GUERRERO

Returns, 26 U.S.C. § 7206(2)]

Cause No.:

THE GRAND JURY CHARGES:

DR1 1 CR0659

COUNTS ONE THROUGH THIRTY-SIX

[26 U.S.C. § 7206(2)]

On or about the dates set forth below, for the Counts set forth below, in the Western District of Texas, the Defendant,

JUAN GUERRERO,

a resident of Crystal City, Texas, doing business as Juan's Tax Service, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of U.S. Individual Income Tax Returns, Forms 1040, either individual or joint, for the calendar years 2005, 2006, and 2007, for the taxpayers known to the Grand Jury, but identified herein only by their initials. The returns were false and fraudulent as to a material matter in that they represented on Schedule C, Profit or Loss From Business, that the taxpayers operated businesses in which they incurred net losses which they were entitled under the provisions of the Internal Revenue laws to reduce their total income, whereas, as the Defendant then and there knew, the taxpayers did not operate such businesses, did not incur such net losses, and were not entitled to reduce their total income in the reported amounts.

The allegations of the preceding paragraph are repeated and realleged in each of the following

counts as though fully set forth therein.

COUNT	DATE	TAXPAYER(S)	CALENDAR YEAR	SCHEDULE C NET LOSS
One	2/20/2006	J. & J. A.	2005	\$ 5,312.00
Two	2/19/2007	J. & J. A.	2006	\$ 9,401.00
Three	2/18/2008	J. & J. A.	2007	\$10,760.00
Four	3/26/2007	R. & A. A.	2006	\$18,784.00
Five	4/15/2008	R. & A. A.	2007	\$14,371.00
Six	4/20/2007	J.C.	2005	\$12,831.00
Seven	4/15/2007	J.C.	2006	\$23,396.00
Eight	4/15/2008	J.C.	2007	\$19,521.00
Nine	4/15/2006	F. & S. G.	2005	\$ 6,779.00
Ten	4/15/2007	F. & S. G.	2006	\$ 7,015.00
Eleven	4/15/2008	F. & S. G.	2007	\$ 7,200.00
Twelve	2/27/2006	A.H. & C.C.	2005	\$ 6,957.00
Thirteen	2/19/2007	A.H. & C.C.	2006	\$12,159.00
Fourteen	2/18/2008	A.H. & C.C.	2007	\$16,948.00
Fifteen	2/27/2006	J. & D. M.	2005	\$ 7,589.00
Sixteen	2/26/2007	J. & D. M.	2006	\$10,206.00
Seventeen	2/8/2008	J. & D. M.	2007	\$14,372.00
Eighteen	2/6/2006	A.M.	2005	\$20,800.00
Nineteen	2/19/2007	A.M.	2006	\$24,376.00
Twenty	2/25/2008	A.M	2007	\$17,105.00
Twenty-one	2/27/2006	R. & L. M.	2005	\$ 4,889.00
Twenty-two	2/19/2007	R. & L. M.	2006	\$ 1,673.00
Twenty-three	3/24/2008	R. & L. M.	2007	\$ 4,886.00
Twenty-four	3/12/2007	M.R.	2006	\$12,381.00

COUNT	DATE	TAXPAYER(S)	CALENDAR YEAR	SCHEDULE C NET LOSS
Twenty-five	3/24/2008	M.R.	2007	\$11,026.00
Twenty-six	2/19/2007	R. & D. R.	2006	\$23,047.00
Twenty-seven	2/11/2008	R. & D. R.	2007	\$23,528.00
Twenty-eight	2/6/2006	R. & R. S.	2005	\$ 3,759.00
Twenty-nine	2/26/2007	R. & R. S.	2006	\$12,893.00
Thirty	3/17/2008	R. & R. S.	2007	\$16,316.00
Thirty-one	3/27/2006	C.T.	2005	\$ 3,339.00
Thirty-two	3/12/2007	C.T.	2006	\$ 4,933.00
Thirty-three	3/10/2008	C.T.	2007	\$ 5,739.00
Thirty-four	3/27/2006	P.T.	2005	\$ 7,859.00
Thirty-five	3/12/2007	P.T.	2006	\$11,045.00
Thirty-six	2/11/2008	P.T.	2007	\$ 8,270.00

All in violation of Title 26, United States Code, Section 7206(2).

A TRUE BILL.

JOHN E. MURPHY
United States Attorney


MARTON GYIRES
Assistant United States Attorney

SEALED:
UNSEALED: XX

**PERSONAL DATA SHEET
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

COUNTY: Del Rio

USAO#: 2011R01438

DATE: April 13, 2011

MAG. CT. #: MATTER

DRI 1 CR0659

AUSA: MARTON GYIRES

DEFENDANT: JUAN GUERRERO

CITIZENSHIP: United States

INTERPRETER NEEDED: No Language: English

DEFENSE ATTORNEY: UNKNOWN

ADDRESS OF ATTORNEY: UNKNOWN

DEFENDANT IS: N/A DATE OF ARREST: _____

BENCH WARRANT NEEDED: _____

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description): 26 U.S.C. § 7206(02) - Preparing False Income Tax Returns.

OFFENSE IS: FELONY

MAXIMUM SENTENCE: 3 years imprisonment; a \$250,000 fine; 1 years of supervised release; and a \$100 special assessment.

PENALTY IS MANDATORY: YES & NO

REMARKS: See above

W/DT-CR-3